

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

|                            |   |                    |
|----------------------------|---|--------------------|
| JUAN VARGAS, #M-17897,     | ) |                    |
|                            | ) |                    |
| Plaintiff,                 | ) |                    |
|                            | ) |                    |
| -vs-                       | ) | No. 15-303-NJR-DGW |
|                            | ) |                    |
| DEPARTMENT OF CORRECTIONS, | ) |                    |
| et al,                     | ) |                    |
|                            | ) |                    |
| Defendants.                | ) |                    |

**MOTION TO EXTEND DISPOSITIVE MOTION DEADLINE**

NOW COMES Defendant, CHARLES CONRAD, by and through his attorney, Lisa Madigan, Attorney General of the State of Illinois, and for his Motion to Extend the Dispositive Motion Deadline, states as follows:

1. The current deadline for motions on dispositive issues is on October 21, 2016, as per Court order. [Doc. 38].
2. On September 16, 2016, defendant Conrad filed a motion to dismiss for sanctions against plaintiff for his disregard of discovery requests. [Doc. 40].
3. Plaintiff responded on September 29, 2016, stating answers to all questions have been answered. [Doc. 41].
4. Plaintiff has again failed to fully comply with defendant Conrad's discovery request as plaintiff only answered nine interrogatories [Doc. 41] out of the thirteen interrogatories submitted to him. [Doc. 40, Exhibit A].
5. Defendant Conrad is unable to prepare a proper motion regarding dispositive issues due to plaintiff's failure to comply with discovery requests.
6. Defendant Conrad requests an extension of the dispositive motion deadline up to and including November 21, 2016.

WHEREFORE, based on the foregoing, Defendant respectfully requests a thirty-day extension for the deadline to file a dispositive motion.

Respectfully submitted,

CHARLES CONRAD,

Defendant,

LISA MADIGAN, Attorney General,  
State of Illinois,

Attorney for Defendant,

By: s/Christopher W. Westenberger  
Christopher W. Westenberger, #6288701  
Assistant Attorney General  
500 South Second Street  
Springfield, IL 62701  
(217) 785-4555 Telephone  
(217) 524-5091 Fax  
E-Mail: [cwestenberger@atg.state.il.us](mailto:cwestenberger@atg.state.il.us)

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| JUAN VARGAS, #M-17897,            | ) |                         |
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| Plaintiff,                        | ) |                         |
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| -vs-                              | ) | Case No. 15-303-NJR-DGW |
|                                   | ) |                         |
| DEPARTMENT OF CORRECTIONS, et al, | ) |                         |
|                                   | ) |                         |
| Defendants.                       | ) |                         |

**CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2016, the foregoing document, *Motion to Extend Dispositive Motion Deadline*, on behalf of defendant Conrad, was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Susannah Price      [sjprice@atg.state.il.us](mailto:sjprice@atg.state.il.us)

Charles Pierce      [cpierce@piercelawpc.com](mailto:cpierce@piercelawpc.com)

I hereby certify that on October 21, 2016, I caused a copy of the foregoing described document to be mailed by United States Postal Service, in an envelope properly addressed and fully prepaid, to the following non-registered participant:

Juan Vargas, #M-17897  
Lincoln Correctional Center  
Inmate Mail/Parcel  
P.O. Box 549  
Lincoln, IL 62656

By: s/Christopher W. Westenberger  
Christopher W. Westenberger, #6288701  
Assistant Attorney General  
500 South Second Street  
Springfield, IL 62701  
(217) 785-4555 Telephone  
(217) 524-5091 Fax  
E-Mail: [cwestenberger@atg.state.il.us](mailto:cwestenberger@atg.state.il.us)